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DIVISION OF OIL, GAS AND MINING

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October 29, 1998

Thru: Joe Helfrich, Permit Supervisor-Compliance WDD 4 for Toe Helfrich

From: Peter Hess, Reclamation Specialist III PH

RE:

Hiawatha Seam Mining Sequence and Timing, Co-Op Mining Company, Bear Canyon #1

Mine, ACT/015/025-98B, Folder #2, Emery County, Utah

SUMMARY:

The proposed change to seal the Hiawatha seam of the Bear Canyon #1 Mine was first received August 14, 1998 at the Price Field Office, DOGM. The initial submittal was deficient in that the permittee failed to address the requirements of R645-301-551, 515.320 and 515.321.

The permittee's response to these deficiencies was received in the PFO on 10/13/98 and 10/19/98. This analysis will address those responses.

TECHNICAL ANALYSIS:

CASING AND SEALING OF UNDERGROUND OPENINGS

Regulatory Reference: R645-301-551.

Analysis:

Sealing of Hiawatha Seam Underground Openings

The submittal received 10/19/98 indicates that the Bear Canyon #1 Mine has three openings in the Hiawatha coal seam to the surface; the main intake portal, and the belt portal, and the escapeway entry which is in the Blind Canyon seam. Page 3-2 of the 10/13/98 submittal indicates that these openings will be temporarily sealed according to the method described in Section 3.6.10.1 of the Bear Canyon mining and reclamation plan. This section refers to using woven wire securely attached to the portal entry. The 10/19/98 submittal proposes to re-word page 3-2 such that seals of cement block construction may be utilized. This method is by far more preferable to MSHA, as the "breathing" of the mine workings caused by barometric pressure changes is virtually eliminated, greatly reducing the potential for spontaneous combustion underground.



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The finalized submittal proposes to seal the three portals with seals constructed of eight inch solid blocks, drywall, plastered on one side. This technique should be adequate to prevent unauthorized access by men or animals. The seal will not be "hitched" into the ribs and floor, as is described under the methods of construction for permanent seals, (See page 3-63, paragraph a, under permanent sealing of mine entries). Pilasters will probably not be incorporated, unless height considerations need to be addressed. Also, these temporary seals will not be backfilled for the required twenty-five feet with incombustible material. The seals will be posted with "No Trespassing" and "Keep Out" notices, and will be inspected regularly and maintained as needed.

This method meets with the minimum regulatory requirement of 301-551 to "otherwise properly manage" by the Division, as well as 30 CFR 75.1711-3. Two of the openings are within the active surface operations area of the Bear Canyon Mine; the third must be examined from the Blind Canyon seam workings. The prevention of unauthorized access by the public or wildlife should not be a problem.

The justification to seal the Hiawatha seam workings stems from the approval of additional leases for Federal coal reserves in the Tank seam or Bear Canyon #2 Mine. Co-Op anticipates that the remaining Hiawatha reserves will not be accessed again until 2007. Economically, it is much more advantageous to seal the Hiawatha seam, rather than ventilate it and inspect same on a weekly basis. As such, the Hiawatha seam workings may be classified as "inactive".

Findings:

The submittal, as received, to temporarily seal the Hiawatha seam mine workings in the Bear Canyon #1 Mine for approximately eight years adequately addresses the minimum regulatory requirements of R645-301-551.

TEMPORARY CESSATION OF COAL MINING

Regulatory Reference: R645-301-515.320, Temporary Cessation of Coal Mining

-515.321, Requirements for Temporary Cessation

Analysis:

The August 14, 1998 deficiency response to the first submittal addressed in error the two regulations mentioned above. The permittee is not intending to cease or abandon operations completely at this Mine. There has been no active mining in the Hiawatha seam for several years; the permittee has now realized the economic justifications to seal same. Hence, this amendment was submitted.

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Findings:

Regulations R645-301-515.320 and 321 regarding Temporary Cessation of Coal Mining are not applicable to this amendment as the permittee intends to continue mining in the #2 Mine until those reserves are depleted. There are no ground water monitoring or water treatment activities currently being performed in the Hiawatha seam.

CONCLUSION AND RECOMMENDATION:

The sealing of the Bear Canyon #1 Mine Hiawatha seam workings is an economic measure proposed by the permittee to help reduce the Mine overhead costs; this seam is currently inactive. The measures to be employed will incorporate sufficient safety devices to ensure unauthorized access to the Hiawatha workings by wildlife and the public.

Submittal ACT/015/025-98B is adequate and should be approved as submitted.

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